

OFFICIAL FILE

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION
DOCKET NO. 00-0700

SURREBUTTAL TESTIMONY OF MICHAEL KIRKSEY
ON BEHALF OF AMERITECH ILLINOIS

Date 4/27/01 Reporter a.c.

I. Introduction

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Michael Kirksey. My title is Area Manager - Network Regulatory. I am employed by SBC-MSI. My Business address is 308 South Akard, Rm. 710.B1, Dallas, Texas 75202.

Q. HAVE YOU PREVIOUSLY FILED REBUTTAL TESTIMONY IN THIS PROCEEDING?

A. Yes, I have.

II. Purpose Of Testimony

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond, from a technical perspective, to rebuttal testimony submitted by Joseph Gillan on behalf of AT&T Communications, The PACE Coalition and Z-Tel Communications and Mr. James D. Webber on behalf of CoreComm Illinois, Inc. regarding the customized routing of OS/DA services and the provision of CLEC's intraLATA toll service using unbundled shared transport. My testimony will also respond to Mr. Gillan's statements regarding technical capabilities of the use of voice mail with UNE-P and resale.

III. IntraLATA toll over shared transport

Q. MR. GILLAN SUGGESTS IN HIS REBUTTAL TESTIMONY THAT AMERITECH ILLINOIS' POSITION THAT CLEC'S INTRALATA TOLL

**TRAFFIC SHOULD NOT BE TRANSPORTED OVER SHARED TRANSPORT
CENTERS AROUND TWO ARGUMENTS:**

**“THE FIRST ARGUMENT BOILS DOWN TO THE CLAIM THAT
COMPLETING ALL FORMS OF INTRALATA TRAFFIC THROUGH
SHARED TRANSPORT MAY RAISE SOME ADDITIONAL
COMPLEXITY FOR BILLING. SECOND, AMERITECH ILLINOIS
CLAIMS THAT THE RECOMMENDATION GOES BEYOND ITS
FEDERAL OBLIGATION”.**

**IS MR. GILLAN’S REPRESENTATION OF AMERITECH ILLINOIS’
POSITION COMPLETE AND ACCURATE?**

A. No. While I would agree that the two issues Mr. Gillan identifies are valid concerns, as further described by Ameritech Illinois’ witness Mr. Hampton¹, Mr. Gillan fails to acknowledge the burden that would be placed on Ameritech Illinois to build and maintain its shared transport network at sufficient capacity to handle the additional load of the intraLATA toll traffic of other carriers, which I discussed in my rebuttal testimony.

**Q. CAN YOU PLEASE EXPLAIN WHY TRANSPORTING INTRALATA TOLL
OVER AMERITECH ILLINOIS’ SHARED TRANSPORT WOULD CREATE AN
UNDUE BURDEN ON AMERITECH ILLINOIS?**

A. If Ameritech Illinois were required to allow the transport of CLEC intraLATA toll over its shared transport that it does not transport today, the addition of new subscribers by the CLECs would add additional traffic to Ameritech Illinois’ existing network that has not been engineered to sufficient capacity to handle such additional traffic. Ameritech Illinois would be required to augment its shared transport capacity to accommodate the additional traffic. A result of requiring additional capacity on Ameritech Illinois’ network would be the potentially significant cost of vendor charges to install additional switching capability as well as additional transport facilities. Furthermore, the problem would be compounded

¹ Hampton Direct at page 12.

1 should multiple carriers be allowed to transport their intraLATA toll over Ameritech
2 Illinois' shared transport.

3 **Q. WOULD FACILITIES-BASED COMPETITION AS ENVISIONED BY THE FCC**
4 **BE FOSTERED IF AMERITECH ILLINOIS IS REQUIRED TO TRANSPORT**
5 **THE CLECS' INTRALATA TOLL OVER SHARED TRANSPORT?**
6

7 A. In my opinion, certainly not. A policy requiring Ameritech Illinois to carry the CLECs'
8 intraLATA toll traffic on its shared transport disincentivizes CLEC and IXC infrastructure
9 investment in the state of Illinois. As Dr. Aron² points out in her surrebuttal testimony,
10 some facilities-based CLECs actually oppose the UNE-P provisions being proposed by
11 Mr. Gillan, since these facilities-based CLECs would be put at a competitive
12 disadvantage under such proposals. Those CLECs presumably would oppose Mr.
13 Gillan's proposal on intraLATA toll and shared transport.

14 **Q. MR. WEBBER STATES THAT CUSTOMIZED ROUTING IS SIMPLY NOT**
15 **REQUIRED FOR A CLEC TO TRANSPORT ITS INTRALATA TOLL OVER**
16 **AMERITECH ILLINOIS' SHARED TRANSPORT.³ IS THIS CORRECT?**

17
18 A. No. Each end user has the option to select an intraLATA toll pre-subscribed carrier of
19 choice for delivery of intraLATA toll service. If Ameritech Illinois' routing tables are not
20 altered or customized, the CLECs' end user's traffic would be directed using standard
21 routing which directs the traffic to trunks assigned to an end user's pre-subscribed carrier.
22 Such trunks are not part of Ameritech Illinois' shared transport.

23 **IV. Customized Routing of Operator Services OS and DA**

24 **Q. MR. GILLAN SUGGESTS THAT AMERITECH ILLINOIS SHOULD PROVIDE**
25 **OS AND DA AS UNES UNTIL A ROUTING SOLUTION IS PROVIDED THAT**
26 **ALLOWS FOR THE AGGREGATION OF OS AND DA. IS THIS**
27 **TECHNICALLY FEASIBLE?**

² Surrebuttal Testimony of Dr. Debra J. Aron at page 12.

³ Webber Rebuttal at page 6.

1
2 A. It appears that Mr. Gillan is suggesting that dedicated trunks to the Ameritech Illinois end
3 office for OS and DA should not be required, but rather that Ameritech Illinois should
4 route the CLEC's OS and DA traffic to an access tandem for delivery over existing
5 Feature Group D (FGD) trunks. It is not technically feasible to route all possible OS and
6 DA call types to existing FGD trunks, or even to route all possible OS and DA call types
7 over common trunks to an access tandem utilizing Signaling System 7 (SS7). For
8 example, when an end user dials "0" it is technically infeasible to deliver this call to the
9 CLEC platform over FGD or common trunks. This is because Ameritech Illinois' central
10 offices utilize Modified Operator Services Signaling (MOSS) for the delivery of OS/DA
11 calls. MOSS signaling does not provide carrier identification and therefore requires
12 dedicated trunks between the Ameritech Illinois end office and the CLEC OS/DA
13 platform.

14 **Q. DOES AMERITECH ILLINOIS UTILIZE DEDICATED OS/DA TRUNKS IN ITS**
15 **NETWORK?**

16
17 A. Yes, Ameritech Illinois has dedicated OS/DA trunks.

18 **Q. HAS MR. GILLAN OFFERED ANY TECHNICAL SOLUTION TO ALLOW**
19 **CUSTOMIZED ROUTING OF ALL POSSIBLE OS AND DA CALL TYPES?**

20
21 A. No.

22 **Q. WHAT IS YOUR RECOMMENDATION?**

23 A. It is clear that there are technical limitations which exist in the ILECs' network regarding
24 the customized routing of OS/DA and that these issues have been previously identified
25 and reviewed by the FCC. The FCC concluded in paragraph 463 of the UNE Remand
26 Order that such interoperability issues do not materially diminish a requesting carrier's
27 ability to provide local exchange service. The Commission should find that while some

1 limitations exist Ameritech Illinois offers CLECs a customized routing solution that will
2 provide for the routing of all OS/DA call types to dedicated CLEC trunks and has
3 therefore met this obligation. In conclusion, Mr. Gillan's suggestion that Ameritech
4 Illinois should provide OS and DA as UNEs until a routing solution is provided that
5 allows for the aggregation of OS and DA is unsupported by his testimony and should be
6 ignored. Ameritech Illinois' proposed AIN-based custom routing tariff submitted in this
7 proceeding meets the FCC custom routing requirements, and Ameritech Illinois is no
8 longer required to offer its OS/DA services as UNEs to CLECs.

9 **V. Use of voice mail with UNE-P and resale.**

10 **Q. DO YOU AGREE WITH MR. GILLAN'S ASSERTION THAT DIFFERENT**
11 **CAPABILITIES EXIST IN AMERITECH ILLINOIS' CENTRAL OFFICE**
12 **SWITCHES FOR THE PROVISION OF VOICE MAIL VIA UNE-P AS**
13 **OPPOSED TO RESOLD SERVICE?**

14
15 A. No.

16 **Q. CAN YOU BRIEFLY DESCRIBE VOICE MAIL?**

17 A. Yes. Voice mail platforms, which are separate and apart from the central office switch,
18 contain hardware and software which allow for the storage of voice mail messages as
19 well as features that provide the end user with the capability of interacting with the voice
20 mail platform. Interaction with the voice mail platform is required, for example, for an
21 end user to retrieve messages. Any end user may subscribe to any voice mail provider
22 that has established interactive capability with Ameritech Illinois' switch. A call
23 forwarding feature is activated against the end user's switch port which will forward the
24 end users' incoming calls in the event the end user is using the phone or does not answer.
25 The incoming caller is then able to leave their message for the end user on the voice mail
26 platform.

1 **Q. ARE THE SAME FEATURES OR FUNCTIONS OF THE AMERITECH**
2 **ILLINOIS CENTRAL OFFICE SWITCHES AVAILABLE FOR EITHER UNE-P**
3 **OR RESALE?**

4
5 **A. Yes, the same features and functions required for the provision of voice messaging are**
6 **available to both UNE-P end users as well as end users served via resale.**

7 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

8 **A. Yes it does.**
9

AFFIDAVIT OF MICHAEL D. KIRKSEY

I, Michael D. Kirksey, being duly sworn, do state that if asked the questions stated in attached Ameritech Illinois' Exhibits, that my answers would be as stated therein.

FURTHER AFFIANT SAYETH NAUGHT


Michael D. Kirksey

Subscribed and sworn to
before me on this 26th
day of June, 2001.


Notary Public

